
North Coast Regional Water Quality Control Board

September 1, 2020

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Dear Responsible Parties:

Site: Masonite Corporation, 300 Ford Road, Ukiah, California
Case Nos. 1NMC042 and 1TMC042

Subject: Review for Potential Case Closure

Regional Water Board staff have identified you as current or past owners, and therefore responsible parties, of parcels that were formerly part of the Masonite Corporation facility located at 300 Ford Road in Ukiah. Residual soil and/or groundwater impacts are present at the parcels and they are not suitable for unrestricted use. Accordingly, and pursuant to California Water Code Sections 13304 and 13307.1, you are being notified that the Regional Water Board is considering this case for closure and that Land Use Restrictions (LUCs) are required for closure to proceed. The following paragraphs and referenced summary memos provide information regarding this determination.

Regional Water Board staff completed a review of the regulatory file for the Masonite Corporation site in Ukiah. The review was performed in consideration for potential case closure and included updating the September 2016 and February 2017 Regional Water Board staff memos.

The data gaps that were identified during the 2016 and 2017 reviews ([link to 2016 review memo for areas west of the railroad tracks](#)), ([link to 2017 review memo for areas east of the railroad tracks](#)) have been addressed. The updated review memo and data gap assessments are attached (electronic only) to this letter and can also be found on the GeoTracker website at:
http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T060456559.

As summarized in the updated memo, the residual contamination in soil and groundwater at the site does not appear to pose a threat to human health, or the environment, and the site is eligible for case closure. It should be noted that the work performed at the site was not based on any potential future land use changes, and additional evaluation would be needed if more sensitive land uses are proposed.

As noted in the first paragraph of this letter, LUCs need to be recorded for each of the parcels at the site that contain residual contamination above cleanup levels. The LUCs would include SCS's 2018 ["Revised Soil and Groundwater Management Plan"](#) (SGMP) and/or require written permission from the Regional Water Board prior to the installation of water supply wells. The following sections describe the residual impacts associated with the respective properties and identify the parcels and the type of LUCs that are required. Parcels and parcel owners are listed in the attached Table 1. Additional site information is provided in the aforementioned updated summary memo.

Groundwater Use Restriction

The following parcels are subject to recording LUCs restricting groundwater use: Assessor Parcel Numbers (APNs) 170-200-03, -04, -05, -07, -08, -09, -15, -18, -19, and 170-210-08.

These parcels overlie a halogenated volatile organic compound (HVOC) plume that is not expected to reach water quality objectives in a reasonable period of time for all constituents in all impacted groundwater for unrestricted use. Therefore, restrictions on groundwater use on these parcels would need to be recorded before case closure. Such restrictions would be recorded in LUCs and would allow for the installation of water supply wells only if approved in writing by the Regional Water Board.

Soil and Groundwater Management Plan

The "[Revised Soil and Groundwater Management Plan](#)" (SGMP) will need to be recorded in LUCs for the following parcels: 170-170-15, -20, -21, -22, and, -23.

Residual soil impacts are present at the parcels and they are not suitable for unrestricted use. Therefore, the SGMP would need to be recorded before case closure. The SGMP defines the procedures that are required to be used for the handling and disposal of contaminated soil and/or groundwater if encountered during future site development activities.

Groundwater Use Restriction and Soil and Groundwater Management Plan

The following parcels are subject to recording LUCs restricting groundwater use, and recording the SGMP: 170-190-24, -33, -34, and, -35.

These parcels overlie a halogenated volatile organic compound (HVOC) plume that is not expected to reach water quality objectives in a reasonable period of time for all constituents in all impacted groundwater for unrestricted use. Also, residual soil impacts are present at the parcels. Therefore, a groundwater use restriction and the SGMP would need to be recorded before case closure. The groundwater use restriction would allow for the installation of water supply wells only if approved in writing by the Regional Water Board. The SGMP defines the procedures that are required to be used for the handling and disposal of contaminated soil and/or groundwater if encountered during future site development activities.

Regional Water Board staff request that the responsible parties provide current contact information to me at Paul.Nelson@waterboards.ca.gov (current email addresses, updated physical addresses, contact person names, parcel ownership information). Draft LUCs will be sent to each responsible party for review. Any changes will be incorporated in the documents and sent to Regional Water Board legal staff for review. After all comments and edits have been addressed, the LUCs can be signed and recorded at the County of Mendocino Recorder's office and site closure can proceed.

Please contact me at Paul.Nelson@waterboards.ca.gov or (707) 576-2686 if you have any questions.

Sincerely,

Paul Nelson, P.G., C.Hg.
Engineering Geologist

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Attachments: Table 1
Summary Update Memo

cc: William Nalty, Mendocino County Department of Environmental Health,
naltyw@mendocinocounty.org
Paul Wisniewski, SCS Engineers, pwisniewski@scsengineers.com

TABLE 1 – Former Masonite Corporation Properties Responsible Parties

Assessor's Parcel Number(s)	Parcel Address	Parcel Owner/Responsible Party	Parcel Owner/Responsible Party Address
170-170-15, -22, and -23 170-190-35	Varies	Friends of Liberty LLC	1307 Masonite Road, Ukiah, CA 95482
170-170-20, -21	Varies	North State Properties LLC	370 Santana Drive, Cloverdale, CA 95425
170-190-24	Varies	Mendocino Industrial Park LLC	1307 Masonite Road, Ukiah, CA 95482
170-190-33	1265 Masonite Road	RHYS Vineyards LLC	11715 Skyline Boulevard, Los Gatos, CA 95033
170-190-34	1315 Masonite Road	30 Degreeish LLC	166 Los Robles Drive, Burlingame, CA 94011
170-200-03, -04, 05, and, -07	410, 420, 430, and 450 Ford Road	Merinos Properties LLC	310 Mason Street, Ukiah, CA 95482
170-200-08	460 Ford Road	Miguel Lopez Merino	310 Mason Street, Ukiah, CA 95482
170-200-09	470 Ford Road	LS Fields LLC	840 Road North, Redwood Valley, CA 95470
170-200-18	550 Ford Road	William Resnick	P.O. Box 175, Saddle River, NJ 07458
170-200-19	650 Ford Road	Maverick Properties Acquisition LLC	751 East Gobbi Street, Ukiah, CA 95482
170-200-15 and 170-210-08	700 Ford Road	Jared and Fiore Talarico	6710 Auden Street, Houston TX 77005

North Coast Regional Water Quality Control Board

Date: September 1, 2020

To: File

From: Paul Nelson

Site: Masonite Corporation, 300 Ford Road, Ukiah, CA
Regional Water Board Case No. 1NMC042

Subject: Case Review Summary Update

The following sections present Regional Water Board staff recommendations for each area of concern (Area 1 through Area 14) at the Masonite Corporation site. Background information for each area, including summaries of investigations, maps and data tables, can be found in the 2016 and 2017 reviews (link to 2016 [review memo for areas west of the railroad tracks](#)), (link to 2017 [review memo for areas east of the railroad tracks](#)). This case review includes assessments of the data gaps that were identified in the 2016 and 2017 reviews.

It should be noted that the work performed in each area was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 1, FORMER PLATING AND EQUIPMENT MAINTENANCE SHOP

Data Gap Assessment

In the 2016 Review, Regional Water Board staff identified two data gaps: 1) Potential volatile organic compound (VOC) releases related to the Former Plating and Equipment Maintenance Shop had not been screened for sufficiently; and, 2) potential releases from the AST and its use had not been screened for sufficiently.

In 2017, SCS performed an additional investigation to address the data gaps identified in the 2016 review. The following paragraphs summarize the findings from the investigation.

Additional soil and groundwater samples were collected from the Former Plating and Equipment Maintenance Shop and analyzed for VOCs. There were no detections in soil above reporting limits (RLs) for VOCs. Benzene concentrations above the WQOs (0.93 and 0.90 micrograms per liter [µg/L]) were detected in this area during the additional 2017 subsurface investigations. Four additional samples were taken north, south, east and west of the detections. Benzene was not detected in these downgradient and cross-gradient samples. It appears that the benzene impact to groundwater is localized and not part of a larger plume.

Soil and groundwater samples were collected from the AST area and tested for VOCs, gasoline (TPH-g), and diesel (TPH-d). TPH-d was detected in soil sample A1-4-5' at a concentration of 293 milligrams per kilogram (mg/kg) with silica gel cleanup and 57.0 mg/kg without silica gel cleanup. Analysis of a deeper soil sample (10.5 feet) within this borehole indicated that TPH-d was not present above the reporting limits (RLs). The groundwater sample collected in the AST area was below the respective RLs for the analytes tested.

Please refer to the April 2017 SCS report ["Report of Additional Subsurface Assessment - Areas 1-10"](#) for details regarding the investigations, sample location maps, and analytical results.

Area 1 Recommendation - Based on the available information, the past release of petroleum hydrocarbons and VOCs do not appear to pose a threat to human health and the environment. This area is included in SCS's 2018 ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a Land Use Covenant (LUC) for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 2, OLD PLATING SHOP AND VEHICLE MAINTENANCE SHOP

Area 2 Recommendation - Based on the available information, the past release of petroleum hydrocarbons, metals and VOCs do not appear to pose a threat to human health and the environment. This area is included in SCS's 2018 ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 4, MAIN MAINTENANCE SHOP

Data Gap Assessment

Regional Water Board staff identified two data gaps in the 2016 Review: 1) Potential VOC releases related to the Former Maintenance Shop had not been screened sufficiently; and, 2) potential releases of PCBs from the electrical transformer had not been screened sufficiently.

In 2017, SCS performed an additional investigation to address the potential VOC releases identified in the 2016 review. Soil and groundwater samples collected and analyzed from the Former Maintenance Shop were non-detect for VOCs. Soil samples were also collected during the 2017 investigation from the Electrical Transformer area and analyzed for PCBs. PCBs were detected in soil during the investigation.

Please refer to the April 2017 SCS ["Report of Additional Subsurface Assessment - Areas 1-10"](#) for details regarding the investigation, sample location maps, and analytical results.

In October 2017, SCS excavated PCB-impacted soil from the transformer area, with the final excavation and final confirmation work performed in July 2018. There was approximately 99 cubic yards of PCB impacted soil removed from beneath and around the perimeter of the former electrical transformer pads. Confirmation sampling of the excavation was below the commercial/industrial screening levels for PCBs.

Please refer to the August 2018 SCS ["Report of Additional Limited Remedial Soil Excavation \(Area 4\)"](#) for details regarding the excavation including soil sample locations and analytical results.

Area 4 Recommendation - Based on the available information, the past release of petroleum hydrocarbons, metals, VOCs, and PCBs does not appear to pose a threat to human health and the environment. This area is included in the 2018 SCS ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a Land Use Covenant (LUC) for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 5, LAP COATING PLANT AND SPLINE SIDING LINE

Area 5 Recommendation - Based on the available information, the past release of VOCs does not appear to pose a threat to human health and the environment. This area is included in SCS's 2018 ["Revised Soil and Groundwater Management Plan"](#) (SGMP) and also overlies a portion of the halogenated volatile organic compound plume that extends to the east. The SGMP and a restriction on groundwater use would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 6, TANK FARM 1 (TF-1)

Area 6 Recommendation - Based on the available information, the past release of petroleum hydrocarbons, and VOCs does not appear to pose a threat to human health and the environment. This area is included in SCS's 2018 ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a Land Use Covenant (LUC) for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC restricting groundwater use. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 7, TANK FARM 2 (TF-2)**Data Gap Assessment**

In the 2016 Review, Regional Water Board staff identified one data gap: 1) Potential petroleum releases related to the Lubrication Oil Storage Area have not been screened for sufficiently.

In 2017, SCS performed an additional investigation to address the potential petroleum releases identified in the 2016 review. Two borings were advanced through the concrete slab. Samples collected were analyzed for TPH-mo. The samples at the one-foot depth were impacted with TPH-mo at concentrations of 1,760 milligrams per kilogram (mg/kg) and 1,880 mg/kg (with/without silica gel cleanup). The five-foot depth impact with TPH-mo was at concentrations of 31.8 mg/kg and 32.6 mg/kg. No groundwater was encountered at the five-foot depths.

Please refer to the April 2017 SCS report ["Report of Additional Subsurface Assessment - Areas 1-10"](#) for details regarding the investigation, sample location maps, and analytical results.

Area 7 Recommendation - Based on the available information, the past release of petroleum hydrocarbons does not appear to pose a threat to human health and the environment. This area is included in the 2018 SCS ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 8, TANK FARM 3 (TF-3)

Area 8 Recommendation - Based on the available information, the past releases of petroleum hydrocarbons and SVOCs do not appear to pose a threat to human health and the environment. This area is included in the 2018 SCS ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 9, TANK FARM 4 (TF-4)**Data Gap Assessment**

Regional Water Board staff identified five data gaps in the 2016 Review: 1) Potential VOC releases related to the former Boiler House; 2) potential polychlorinated biphenyl (PCB) releases from the electrical transformer; 3) potential metal releases related to the former Boiler House storage facility; 4) potential releases related to the former Cooling Tower, and; 5) potential releases related to the former Sludge Plant.

These data gaps were addressed in 2017 by SCS. Analysis of the soil samples from the former Boiler House, Transformer, Cooling Tower, and Sludge Plant were not impacted with COPCs. Chromium, mercury, and lead concentrations were generally within normal background concentrations and all other constituents of potential concern tested were below respective reporting limits. Please refer to the April 2017 SCS report ["Report of Additional Subsurface Assessment - Areas 1-10"](#) for details regarding the investigation, sample location maps, and analytical results.

Area 9 Recommendation - Based on the available information, the past release of petroleum hydrocarbons, PAHs, metals, PCBs, and VOCs do not appear to pose a threat to human health and the environment. This area is included in the 2018 SCS ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 10, MAIN PRODUCTION FACILITY (NORTHERN SECTION)

Area 10 Recommendation - Based on the available information, the past release of petroleum hydrocarbons and metals does not appear to pose a threat to human health and the environment. This area is included in the 2018 SCS ["Revised Soil and Groundwater Management Plan"](#) (SGMP). The SGMP would be recorded with a LUC for all parcels in this area. Regional Water Board staff recommends no further action except the recording of the SGMP and LUC. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 11, WATER TREATMENT PONDS

Area 11 Recommendation - Based on the available information, the past release of petroleum hydrocarbons, metals, PAHs, dioxins, and VOCs does not appear to pose a threat to beneficial uses of water on the parcels in this area of the former Masonite site east of the railroad tracks. Regional Water Board staff recommends no further action for this area. It should be noted, however, that the work performed in this area was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 12, BONEYARD AND FIRE FIGHTING TRAINING AREA

Data Gap Assessment

Regional Water Board staff identified two data gaps in the 2017 Review: 1) Foundation belonging to the former forestry building; and, 2) Fenced-in area west of the hazardous waste concrete pad. SCS submitted a letter dated April 2017 ([April 2017 SCS Letter](#)) indicating that the fenced area was a relatively recent utility infrastructure. SCS also stated that, according to the former plant manager, there was no hazardous materials stored in the former forestry building. No further work appears to be necessary for these concerns.

Area 12 Recommendation - Based on the available information, the past release of petroleum hydrocarbons and dioxins does not appear to pose a threat to beneficial uses of water on the parcels in this area of the former Masonite site east of the railroad tracks. Regional Water Board staff recommends no further action for this area. It should be noted, however, that the work performed was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 13, SOUTH IRRIGATION FIELD, UNIMPROVED AREA AND THE HOP BARN

Area 13 Recommendation - Based on the available information, the past release of dioxins does not appear to pose a threat to beneficial uses of water on the parcels east of the railroad tracks in this area of the former Masonite site. Regional Water Board staff recommend no further action regarding dioxins in Area 13.

Detectable levels of TCA and 1,1-DCA in the groundwater sampled from the Sawyer well do not represent a comparable quality (background level) of water. Regional Water Board staff recommends that a LUC with a restriction on groundwater use be recorded for each parcel overlying the HVOC plume before case closure. Such a restriction would be recorded in a land use covenant and would allow for the installation of water supply wells if approved by the Regional Water Board. It should also be noted that the work performed in this area was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed.

AREA 14, IRRIGATION FIELDS A, B, AND C

Area 14 Recommendation - Based on the available information, the past release of petroleum hydrocarbons and dioxins does not appear to pose a threat to beneficial uses of water on the parcels in this area of the former Masonite site east of the railroad tracks. It should be noted, however, that the work performed in this area was not based on any potential future land use changes, and additional evaluation would be needed if a more sensitive land use is proposed. Regional Water Board staff recommends no further action for this area.